The NPRM seems to go far in convicing Amateur Radio operators that the interference potential is a small issue , but,:
1. CCS is typically VLF and LF signals with wavelengths in thousands of meters. BPL uses HF signals
with wavelengths in tens of meters. Is it reasonable to classify BPL with the same limits and
measurement techniques as traditional CCS?
And, The NPRM requires BPL providers to establish a centralized database describing their BPL
deployments and managing complaints. What should that database look like? Who should have access?
How?
Also, Part 15 assumes CCS devices are point sources … i.e. field strengths fall rapidly as you move away
from the device along the power line. This is valid for VLF and LF CCS. Is it valid for BPL at HF? How?
Also, Once deployed, it will be nearly impossible to "undeploy" BPL if interference problems materialize. Does
the FCC really want to take an irreversible action? Would a step-wise approach make more sense?
It only seems to be a reasonable approach to consder some of these things, being the leeding Government Agency involved with Spectrum regulation. Can we as citizens of this country count on you to take the lead in setting the correct priorities in regards to this matter? As a government and military employee, I should hope so.